



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP
F.#2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 2, 2019

By ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Garaufis:

With consent of the defendants, the government respectfully requests that the protective orders governing discovery materials (Dkts Nos. 85 and 104) be extended to cover materials the government intends to produce pursuant to 18 U.S.C. § 3500 and Giglio v. United States, 405 U.S. 150 (1972) (together, the "Section 3500 Material"). A proposed order is attached hereto as Exhibit A.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Moira Kim Penza
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cc: Clerk of the Court (NGG) (by ECF)
Counsel of Record (by ECF)